

# Certification Webinar Q & A

## EFFECTIVE DATE OF POLICIES

Q: When are the new policies effective?

**A: Regardless of when the WIC Policy and Procedure Manual (WPPM) is updated, the program changes are effective no later than October 1, 2015. You may begin to implement the changes in the Adjunctive Eligibility policy now “To be adjunctively eligible for WIC, an applicant shall be a member of a family in which any member is certified as fully eligible to receive Cal Fresh.”**

Q: When will the Self Declaration Statement go into effect?

**A: No later than October 1, 2015. We will notify you when the Self Declaration Statements are available to order.**

Q: Will there be a PWPC that goes out when the policies are effective?

**A: You will be notified when the WPPM is updated.**

## SELF DECLARATION STATEMENT

Q: Are agencies required to use this new self-declare form and not the local-agency created form?

**A: Yes, all local agencies will be required to use the state developed Self Declaration Statement.**

Q: If the participant has income documentation for herself but not spouse, do we have them fill out the Self Declaration Statement?

**A: Yes, the participant needs to bring proof of income from ALL working household members. If they do not bring in the spouse's income, “N” must be documented and the Self Declaration Statement signed.**

Q: Self Declaration form only used at the enrollment but not at the recertification, correct?

**A: No, the Self Declaration Statement is used at ALL certifications when appropriate, whether it is an enrollment or recertification. Income, address and identification (ID) are verified at every certification.**

Q: Do all clients that forget their POI have to sign a Self Declaration Statement?

**A: Yes, as long as you can't verify income eligibility via adjunctive eligibility.**

Q: Why the need to complete a self declaration statement when we are going to put the file on hold?

**A: This is a new USDA requirement to ensure that documentation is brought in within 30 days and no additional benefits are issued until the certification is completed.**

Q: Did I hear correctly that staff needs to complete the Self Declaration Statement? Will applicants remember what to bring in if they don't fill in the form?

**A: Yes, staff is to complete the Self Declaration Statement based on information declared by the applicant as we feel it is easier for staff to fill in the form and then review the information declared by the applicant as the applicant signs the form.**

**To help the applicant remember what to bring in for the next appointment, staff should ask the applicant what they might bring in or give them ideas and write that on their reminder notice or back of their WIF.**

Q: Will these Self Declaration Statements also be in Chinese?

**A: Yes, the Self Declaration Statements will be translated into several languages: Arabic, Armenian, Chinese, Hmong, Russian, Spanish, and Vietnamese.**

Q: Can an alternate sign Self Declaration for themselves if they don't have a valid ID?

**A: No, an alternate needs to bring identification plus the WIF in order to serve as an alternate. The Self Declaration Statement is used only for certification to meet the eligibility requirements of an applicant.**

Q: Where do we place the Self Declaration Statement when signed by participant?

**A: The Self Declaration Statement is kept with the daily files.**

Q: Is the self declaration form needed when using the O code?

**A: No, when using the "O" code for "other", an ISIS Family Comment is needed to describe the type of document brought in. The only exception is when using the "O" code for address for "a resident of a remote Indian or Native village" or "a resident of a rural location where there is no mail delivery". In this case, an ISIS Family Comment is needed in addition to filling in the Self Declaration Statement.**

Q: Does a Zero income require a signed Self Declaration Statement?

**A: No. It is sufficient that the applicant signs the Rights & Responsibilities form which states "I certify that the information and documents I have provided for my eligibility determination are true and correct, to the best of my knowledge and belief...." For zero income, use the "O" code for "other" and write an ISIS Family Comment.**

Q: Have you thought of doing a carbonized form so that we could give the participant a copy of the self declaration statement? We often hear participants tell us they were never told to bring this information back. Having the copy in their WIF would be a good reminder.

**A: We do not plan on making the Self Declaration Statement carbon copied. Reviewing with the participant what specific documentation they will bring in the following month and writing it in the WIF should help them remember.**

Q: What if they refuse to sign the Self Declaration Statement (even after explaining it to them)?

**A: Signing this form is necessary in order to certify the individual and give them 30 days of benefits. In the event the applicant refuses to sign the form, you may offer that they go home, obtain the missing documentation, and return to the WIC office to receive benefits.**

## **ADJUNCTIVE ELIGIBILITY**

Q: Do we need to document that they are adjunctively eligible when they have an active Medi-Cal card shown through F7MEDS? POI: Medi-Cal?

**A: No, if the individual shows a Medi-Cal eligibility code when using F7MEDS, no further documentation is needed to show adjunctive eligibility for that individual.**

Q: If we use another member's food stamps to make the participant adjunctively eligible, does that member need to be another WIC participant who can prove this via meds interface?

**A: No, but you must have current proof of that family member receiving CalFresh and document in ISIS Family Comments.**

Q: How do we verify CalFresh for a family member not enrolled in WIC?

**A: In policy 210-02 Adjunctive Eligibility Guidelines, examples of acceptable documentation include: recent aid notification letter or verbal verification by county eligibility worker. Document in ISIS Family Comments what verification obtained to determine adjunctive eligibility.**

Q: If the family member shows the Cal Fresh EBT card, does that count as proof?

**A: No, there is no current date of eligibility for CalFresh on the EBT card, so the CalFresh EBT Card cannot count as proof of eligibility.**

Q: Even though there is an “N” code if infant doesn't have Medi-Cal, but mom and/or another sibling does, we can still issue for the other people in the family who do have active Medi-Cal, right?

**A: Yes, as long as the other individuals have satisfied the income documentation requirement and all other eligibility documentation requirements when they were certified, you can issue benefits to those family members.**

Q: If mom is postpartum and has TANF or Food Stamps, does infant qualify adjunctively?

**A: Yes, but staff must document in ISIS Family Comments that saw current proof of mom having TANF or CalFresh therefore making the infant adjunctively eligible.**

Q: What do you do if the family is over income and mom has applied for Medi-Cal for baby but Medi-Cal is pending and has not received card?

**A: If over income, the baby is not eligible for WIC unless the baby has Medi-Cal and you can verify adjunctive eligibility via F7MEDS interface.**

Q: If a mom is over income and has private insurance but her child has CalFresh, is she eligible?

**A: Yes.**

Q: If mom has SSN or Medi-Cal number for a non-WIC family member on CalFresh, can we use MEDS as proof of CalFresh?

**A: No, you will need to obtain another proof that the non-WIC family member receives CalFresh.**

Q: What is considered a family member? Immediate Family or can an Aunt be used in living with family?

**A: For income eligibility determination, one must define the Family Economic Unit per policy WPM 210-03.**

Q: Usually these letters that communicate eligibility/participation in the CalFresh program have expiration dates and/or are updated each quarter or so. How do we deal with this given that cert periods are typically between 6-12 months?

**A: The Notice of Eligibility letter for CalFresh should show eligibility for the current month, and then the individual is adjunctively eligible for their whole certification period.**

Q: If a mother is pregnant, and her children who are over 5 years old have CalFresh, can this qualify the mother for WIC?

**A: Yes, as long as documentation of current eligibility for participation in CalFresh was shown.**

Q: What if the income source "A" is used because the postpartum mom has TANF at infant enrollment (no MC, Food Stamps, TANF for infant). Mom falls out of WIC at 6 months postpartum due to non-breastfeeding. Is the infant still adjunctively eligible for the full year?

**A: Yes, once the infant is determined adjunctively eligible at certification, they are eligible for their whole certification period. You don't reassess income mid-year.**

Q: What do you do when a PP recert is being done along with the infant enrollment? Mom has Medi-Cal but infant does not have it. What code to use as POI?

**A: Use "N" for POI unless the mom can make the infant adjunctively eligible due to receiving CalFresh or TANF or if another proof of income is brought in.**

## **INCOME ELIGIBILITY**

Q: What other types of income can we use for an infant if the mother has Medi-Cal and she is breastfeeding?

**A: Policy 210-03 describes examples of income sources. Also, refer to the F4 drop down menu for the types of income documentation or refer to the USDA Documentation Codes Job Aid.**

Q: If I see a participant today and she doesn't have POI, can I schedule her next appointment for after 30 days?

**A: No, proof of income must be brought in within 30 days, so the next appointment must be scheduled within 30 days. One should always try to schedule the next appointment within 30 days so they are not left without benefits.**

Q: If participant brings back after 30 days a letter of approval from Medi-Cal but no Medi-Cal card or a Medi-Cal number, can we accept as proof of income?

**A: Yes, the documentation code would be "V" for aid verification letter/notice of action.**

Q: What do we do if a participant brings in electronic proof of income- e.g. shows it to us on their cell phone?

**A: USDA allows applicants to show their paystub electronically via their cell phone, assuming the information on the pay stub is legible and meets the same State agency requirements for paper documentation.**

Q: How would you document on the family screen income verification if income is pending for an infant enrolled in the previous month and the mom is being recertified this month and she has Medi-Cal for herself. The infant does not have Medi-Cal card yet.

**A: The infant enrolled the previous month should have used "N" for income. The subsequent month, there needs to be proof of income for the infant in order to meet the eligibility requirements and issue benefits. An "A" for income is not**

**allowed for the infant since the infant does not yet have Medi-Cal. If you use “A” for income for the mother, the infant is not yet eligible. Suggest using another proof of income, i.e., pay stub.**

Q: What if parents have no income themselves, and they are part of a household with income, but they cannot obtain a document from the income-earner in the household?

**A: If the household (Family Economic Unit) includes the income of others, then you need to see documentation of every income earner in the household unless the applicant has Medi-Cal in which adjunctive eligibility can be used and income can be self-declared.**

Q: If a participant has no income herself but she gets cash from a relative who is living with her, should I ask her to sign the self-declaration statement? Or do I have to include the relative in the family size and ask the relative for POI? (I found out the relative feels ok to write a letter to verify cash support but the relative doesn't want to provide her own POI since she doesn't apply for WIC).

**A: You must determine what the Family Economic Unit is based on asking questions about the living situation and sharing of goods and services. It may be that you determine that the family economic unit includes the participant and the relative, in which case you need income documentation from the relative.**

Q: Is the self declaration sufficient for people that are paid in cash?

**A: Yes, the policy has not changed for this.**

Q: Scenario: participant comes to f/u appointment where they are supposed to provide proof of income, exactly 30 days after they applied and they don't have any proof of income and they aren't adjunctively income-eligible. You just said we can reschedule the appointment to try again, as long as we don't issue more checks first. How far out can we get the proof of income and not disqualify them?

**A: After 30 days, if the applicant comes in without proof of income or address, they are ineligible and cannot receive further benefits. You can either fill out the Notice of Action Affecting WIC Program Applicants checking “Eligibility documentation is inadequate” writing in the date the form is filled out, OR you**



**can opt to reschedule the appointment as soon as possible the same month to offer them the opportunity to bring in the missing income or address documentation.**

**We say you can opt to reschedule the individual for later the same month since making them ineligible in ISIS will delete the individual record. The important thing is that you are not issuing another 30 days of benefits until you receive the documentation of income or address.**

Q: Does a person who self declares income for one of the reasons such as cash, turned out of home, or disaster needs to bring income the next month. How long can they self declare?

**A: Self declaration under these circumstances is for the entire certification period for that individual.**

Q: Sometimes Medi-Cal does not get approved within 30 days, then what?

**A: Another form of income documentation must be brought in to meet the income eligibility requirement.**

Q: Does CalFresh amount count as part of the income?

**A: No**

Q: Is there any limit to how old income tax form can be for POI? In other words, can we take, today 6/15/15, someone's 2014 tax return for POI?

**A: For a self-employed person, the income tax return should be the most recent tax return filed for POI. For those not self-employed, you must use current income or annual income over the past 12 months, whichever most accurately reflects the family's income status, as stated in policy 210-03.**

## **PROOF OF ADDRESS**

Q: What is the process for clients that transfer from a different county and have a 30 day hold for address that has expired? Do you start a new 30 days since they are in a new county?

**A: No, they do not get another 30 days to bring in documentation if they transfer because there is already a 30 day hold on the ISIS file for address documentation.**

Q: What if their proof of address is NOT in their name but is stated that it is under the name of another person who lives in the house. Would that be allowable proof of address? e.g. electric bill has a physical address on the bill but the bill is not in their name.

**A: It depends. The policy 210-06 Proof of Address states the proof needs to be in the name of the applicant/participant, spouse or parent/caretaker applying on behalf of an infant or child under the age of five years.**

Q: If proof of address is not brought in after 30 days, can we issue the FI for the rest of the family and only hold the FI for the participant which recert was the one missing this information? - same for POI

**A: Yes**

Q: Can we use electronic medical records for address verification?

**A: No, there is no proof that the medical office obtained proof of address when entering in the information into the electronic medical record.**

Q: What do we do if the client lives with other people and does not have anything in their name?

**A: You can mail them a post card or letter to their home so they will have something in their name.**

Q: What about self declaration of address due to "rural area with no home mail delivery"?

**A: The revised Self Declaration Statement includes “a resident of rural area with no home mail delivery” and “a resident of a remote Indian or Native village”. One must document “O” for POA, write an ISIS Family Comment, and have the applicant sign the Self Declaration Statement.**

Q: Can we use the smart phone for proof of address, i.e., showing paycheck stub or ebill?

**A: We are looking into the option of using smart phone technology for the purposes of verification and appropriate documentation for proof of address.**

Q: If address was brought in less than 30 days ago & we are completing another recert do we need to put in "A" hold?

**A: If when going through the certification pathway to either enroll or recertify an individual, it shows ISIS still populating the address and income documentation information from a certification done less than 30 days earlier, there will be no need to get current proof of address or income as this information less than 30 days old is considered still current.**

## **PROOF OF IDENTIFICATION**

Q: How should we handle the situation when participant/applicant has had her purse stolen with all ID inside?

**A: She will still need to bring in proof of ID. Use the F4 drop down list or the USDA Documentation Code Job Aid to discuss the ID documents that she can bring in.**

Q: If mom has other active children on the program and she enrolls as pregnant. Can she use the WIF as Proof of ID?

**A: No, if the mom is not currently enrolled herself, regardless of having others in the family on WIC, staff must establish initial proof of identification for the mom using a document other than the WIF.**

Q: For WIF identification mom enrolled pregnant first time. Eight months later pregnant again and not receiving WIC benefits. Can she use her WIF as proof of ID?

**A: No, if her past certification period is over and her past individual ISIS record is no longer accessible, she is being enrolled, not recertified, and the WIF cannot be used as proof of ID for an enrollment.**

Q: Can we use "R" medical referral form for proof of ID for prenatal enrollment?

**A: Yes, that is an allowable source for ID. Refer to the USDA Documentation Code Job Aid for acceptable forms of ID.**

Q: Can we use the WIF for a child recertification proof of ID even if the child's name is not written inside the folder?

**A: Yes, assuming the child currently has an individual ISIS record and is not being enrolled, but recertified. Train staff to be sure to write each individual's name inside the WIF when initially enrolled and when replacing the WIF.**

Q: Hospital bracelets don't always have a baby's name on it. Is full name required to be on the bracelet?

**A: Proof of identification needs to have the "name of the person" (policy 270-20), so if the hospital bracelet doesn't have the name on the bracelet, it cannot be used as proof of ID.**

Q: Participant cannot be enrolled with no ID?

**A: Correct. One cannot be enrolled without providing proof of ID.**

Q: Did I hear you say that you cannot use N code for ID, if they have signed self declaration for disaster, homeless or migrant?

**A: There is no "N" code for identification. If using the Self Declaration Statement for identification, the codes to use are "D", "H" or "M".**

Q: For ID, can we use the medical # or social security # that is already in the system when we do a recertification?

**A: No, you must have a document in hand to document proof of identification or use “W” for WIF for ID for a recertification.**

Q: Can we use a picture from cell phone for ID such as social security card picture.

**A: We are looking into the option of using smart phone technology for the purposes of verification and appropriate documentation for identification.**

Q: If alternate brings child for recertification but has no WIF or ID for child, can we proceed with the recertification or reschedule.

**A: First of all, an alternate cannot recertify a child; it must be the parent/guardian. In addition, proof of identification is needed to certify, so for both those reasons the appointment must be rescheduled.**

## **PRESENCE AT CERTIFICATION**

Q: If parent cannot bring infant at 8 weeks and is at your WIC office, what's done? disqual?

**A: The infant cannot receive further benefits. You may reschedule for later that month to offer the parent the opportunity to bring in the infant.**

Q: If you place an "O" hold for using D, H, or W, then when does the policy say we should remove the "O" hold?

**A: The current policy 210-07 does not say when the “O” hold is removed. Remove the hold when the individual with the “D” or “H” is present at the WIC office. We are aware the “O” hold can be placed for only 4 months in ISIS, and we are investigating if this can be changed in ISIS.**

Q: Can we use the "D" and the "H" code for every cert, or does the child need to be brought in the following cert?

**A: It depends on the situation and needs to be reassessed each certification. If the "D" or "H" conditions still exist, then it would be appropriate to use it again.**

Q: Can we do recert/cert without infant/child's ht and wt?

**A: No, certification requires a current height and weight per policy 210-10. If the child is not present at cert and the "D", "H" or "W" code used for presence, a height and weight must be brought in on the WIC referral form or another appropriate source. The only exception to not having the height and weight at certification is when the infant is enrolled and is not present at certification. In this case an IPC hold is placed, and the infant is present within 8 weeks at which time the length and weight can be taken and entered into the ISIS record.**

Q: Clarification...At recertification if both parents are working and unable to bring child to the recertification appointment, then we do not need the child to be brought in the following month. Is this correct?

**A: Correct, the child would need to be brought in at the next certification appointment one year later.**

Q: Did you say use disabled for chicken pox?

**A: Yes, the policy 210-07 gives the example of using "D" for disabled saying "Participant/Caretaker or infant/child has contracted a contagious disease such as active tuberculosis or chicken pox."**

Q: When the "H" or "D" code is used, can the reason for using the "H" or "D" code information be given verbally by parent or we need MD referral paper?

**A: The parent may provide the reason for using the "H" or "D" code, but if you have concerns about the information, it is reasonable to ask for documentation on the WIC referral Form.**

Q: Part of your audit findings on slide 8 states that we have to show evidence that infant was brought in, are we now then required to document this in individual or family comments?

**A: No, if the infant was not present at certification, and staff documents “I” for presence and places the IPC hold, removing the hold before the infant is 8 weeks old is proof that the infant was brought in. ISIS stamps the record in ISIS Family Comments when the IPC hold is removed.**

Q: At enrollment, sometimes the I/C is going through chemotherapy, wouldn't we use “H” for presence at enrollment?

**A: No, “H” for presence cannot be used at enrollment, only at recertifications. In this situation, one can use “D” for presence using the definition of “D” as “a serious illness that may be exacerbated by coming into the WIC site.” An “O” hold with an ISIS Family Comment should describe the situation.**

Q: Scenario: mom comes into WIC office w/o infant. Infant is 2 weeks old. We place an IPC hold and issue 1 mo of benefits. At next appt, infant is 6 weeks old. Mom still did not bring infant to the appt. Can we issue one more month of benefits b/c infant is still under 8 wks of age?

**A: No, only a single month of benefits can be issued. In order to issue more benefits, the infant must be present.**

Q: We visit Moms in hospital and see the infant at that time. We then enroll the infant when we return to the office. Will that be acceptable since the infant will have been seen?

**A: No, all certification (enroll/recert) appointments need to occur at authorized WIC sites.**

Q: What if the baby is a preemie or is told by MD to stay away from public places due to medical condition for infant presence?

**A: The infant is “D” for disabled using the definition “a serious illness that may be exacerbated by coming into the WIC site.” In this case an “O” hold with an ISIS Family Comment should describe the situation.**

Q: Can we have "W" option for child presence available when going thru enrollment?

**A: No, the “W” code for presence at certification can only be used for a recertification and not an enrollment. The child must be present at the initial enrollment.**

## **INFANT IN NICU**

Q: How should ID be documented at enrollment for infants who are in the NICU for 3 months?

**A: The USDA Documentation Codes Job Aid lists several examples of proof of ID. Commonly seen for newborns are: birth certificate/hospital birth verification, crib card or immunization record. Even if an infant is enrolled and not present at certification, proof of identification is still required.**

Q: What if a baby is in NICU, can she/he be enrolled with the "H" presence at enrollment code?

**A: No, “H” for presence cannot be used for enrollment, only recertification. Use an “I” for presence and place the IPC hold unless you think the baby will be in the NICU beyond 8 weeks, in which case use “D” for presence, and place an “O” hold with an ISIS Family Comment.**

Q: What if the infant is still in the NICU after 8 weeks?

**A: If the infant was enrolled using “I” for infant presence at certification and is still in the NICU at 8 weeks, then the infant is disabled, and an ISIS Family Comment can be written stating infant is still in NICU and an “O” hold placed. When the infant is out of the NICU and present at WIC, an ISIS Family Comment can be written and the “O” hold and “IPC” hold removed.**



Q: When we do an enrollment on an infant who is in the NICU, what code do you use for presence "I" or "D".

**A: Use "I" for presence unless the infant is more than 8 weeks premature and you anticipate the infant being in the NICU beyond 8 weeks of age, in which case it would be appropriate to use "D" for presence. If you use "I" for presence, single issue benefits, and the infant is still in the NICU the following month, you can place an "O" hold, write ISIS Family Comments that the infant is Disabled and remains in the NICU, and keep the IPC hold and "O" hold until the infant is present.**

Q: If a mom needs a pump for an infant in NICU, don't we have to enroll the baby?

**A: No, the pump is for the mother, so it is not necessary to enroll the baby in order to issue a pump to the mother.**

## **PROVISIONAL ENROLLMENT**

Q: When does "no provisional enrollment" go into effect?

**A: The expectation is that you start training staff now to discontinue provisional enrollment and have this fully implemented by October 1<sup>st</sup>, 2015. No certifications (enroll/recert) may occur over the phone. All certifications are to occur at authorized WIC sites.**

Q: Is the reason for not allowing provisional enrollment of infants the fact that they are not present?

**A: We are no longer allowing provisional enrollment because it is inconsistent with certification requirements and has led to many audit findings due to documentation of "N" for income and address, "O" for identification and "I" for infant presence due to it occurring over the phone.**

Q: If we have written birth verification in the form of pump requests from hospitals, can we still do enrollments of baby over the phone?

**A: No, provisional enrollment, enrolling infants over the phone, will no longer be allowed for any reason effective October 1, 2015.**

Q: We use the protocol on the WIC website under Baby Behaviors “Beginning the Infant Enrollment Process by Telephone.” Can we continue to use this protocol?

**A: No, this protocol is essentially provisional enrollment (minus issuing FIs) and will no longer be allowed. We suggest you schedule a WIC appointment as soon as possible after birth. You may complete the pregnancy outcome in ISIS and provide breastfeeding support over the phone until mom/baby can come to the WIC appointment.**

## **MISCELLANEOUS**

Q: Can an alternate bring proof of income or address when they come back in 30 days, or does it have to be the participant.

**A: Yes, assuming the certification was completed earlier (except POI or POA), an alternate can bring in proof of income or address 30 days later.**

Q: Are we to make a Xerox copy of any address, id, and/or income to put in the daily files?

**A: No, it is not necessary to Xerox a copy of documentation brought in.**

Q: Can we still "postpone" a recert to the following month if they don't have income/address/ID?

**A: Yes, as long as they aren't a “must cert” and can still get benefits the current month, you may postpone the certification for the following month.**

Q: If a person lives in a shelter, can we use the self declaration statement, and is it good for the entire certification period.

**A: Yes, living in a shelter can be considered homeless, so the Self Declaration Statement would be filled out and is good for the entire certification period.**

Q: So, can we enroll if neither income nor address is brought?

**A: Yes, the policies have not changed, and the individual can self-declare both income and address for 30 days.**

Q: When using an "N" for no income or no address, do we still need to place a hold on the following month's FI's?

**A: Yes, the policies 210-03 and 210-06 say when using "N" for no income or address, place a hold for income or address in the Family Holds screen, plus place a hold on printing of the food instruments for the next month. That means if it is May, the hold is effective for June. This does not mean that you place a hold on the FIs at the prepare packages to print screen.**

Q: Teen turned out of home does that apply to teens in group homes?

**A: No, use homeless for a teen in a group home.**

Q: Can we issue to alternate when they come for participant's appointment with WIF, when alternate has no identification?

**A: No, policy 270-20 states "Local agencies shall require each proxy or alternate to provide proof of ID at each appointment, which includes obtaining food instruments and may include nutrition education, but not certifications."**

Q: So, if documentation is not brought in within 30 days, do we have to manually disqualify them to remove them from the ISIS system? Otherwise they stay in ISIS in our unissued report.

**A: Yes, that is what the policy 210-03, page 7 of 9, states.**

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